

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ADAM WENZKE
PLAINTIFF

v.

CORRECTIONAL MEDICAL
SERVICES ET AL.
DEFENDANTS

CIV. ACTION No 07-504-SLR



ms scanned

NOTICE OF INTERROGATORY

PLEASE TAKE NOTICE THAT PURSUANT TO RULE 33, FED. R.
CIV. P. THE PLAINTIFF SUBMITS THE FOLLOWING INTERROGATORIES
TO THE DEFENDENT DR. TADEO
TO ANSWER EACH OF THE ATTACHED INTERROGATORIES IN WRITING
UNDER OATH, WITHIN 30 DAYS OF SERVICE.

July 29, 2008
DATE

ADAM WENZKE #182595
PLAINTIFF
DELAWARE CORRECTIONAL CTR.
1181 PADDOCK ROAD
SMYRNA, DE 19977

INTERROGATORIES

- 1) EXPLAIN AND DESCRIBE ANY TREATMENT THAT DEFENDANT PROVIDED AND /OR ADMINISTERED TO THE PLAINTIFF EVERY TIME HE CAME TO SEE YOU ABOUT THE SAME MEDICAL PROBLEM?
- 2) EXPLAIN AND DESCRIBE THE MEDICAL FACTORS THAT DEFENDANT RELIED UPON REGARDING THE TREATMENT PROVIDED TO THE PLAINTIFF WHEN HE CONTINUALLY CAME TO THE INFIRMARY WITH THE SAME PAINFUL PROBLEM?
- 3) EXPLAIN AND DESCRIBE THE "INFORMED CONSENT" YOU RECEIVED OR OBTAINED FROM THE PLAINTIFF TO TREAT HIS TESTICULAR PAIN WITH TYLENOL AND THE INFORMATION YOU PROVIDED TO HIM ABOUT THE SHORT AND LONG TERM SIDE EFFECTS OF SAID TREATMENT?
- 4) EXPLAIN AND DESCRIBE THE INFORMATION YOU GAVE TO THE PLAINTIFF EXPLAINING THE LONG TERM EFFECTS OF THE MASSIVE USE OF TYLENOL FOR SOMEONE WHO'S BEEN CO-INFECTED WITH TWO DIFFERENT TYPE STRAINS OF THE HEPATITIS C VIRUS?
- 5) EXPLAIN AND DESCRIBE IF YOU'VE BEEN TRANSFERRED OR DISMISSED FROM ANY PREVIOUS JOBS FOR INADEQUATE MEDICAL TREATMENT OR HAD A DISCIPLINE REPORTS, WARNINGS, REPRIMANDS, AND COMPLAINTS ABOUT YOUR PERFORMANCE AS A PRISON DOCTOR?

- 6) EXPLAIN AND DESCRIBE THE FUTURE RISKS THAT YOU ADVISED THE PLAINTIFF ABOUT TESTICULAR CYSTS ON THE EPIDIDYMEDES OF BOTH TESTICLE'S AND THE POSSIBILITY OF BECOMING STERILE IF ~~HE~~ HAD TO HAVE A EPIDIDYECTOMY?
- 7) EXPLAIN AND DESCRIBE WHY YOU FAILED TO ACT/RESPOND WHEN YOU FOUND OUT THAT PLAINTIFF HAD WON HIS MEDICAL GRIEVANCE APPEAL TO THE BUREAU CHIEF RICHARD KEARNEY TO BE SENT BACK TO THE UROLOGIST OFFICE?
- 8) EXPLAIN AND DESCRIBE WHY YOU KEPT CONTINUING THIS COURSE OF TREATMENT FOR 4 LONG YEARS KNOWING THAT THE PLAINTIFF WAS SUFFERING AND HIS REPEATED REQUEST FOR MEDICAL TO HELP HIM RELIEVE HIS PAIN AND SUFFERING BECAUSE TYLENOL WAS NOT WORKING?
- 9) EXPLAIN AND DESCRIBE THE TRAINING THAT C.M.S. PROVIDED FOR YOU AFTER YOU WERE HIRED FOR A MEDICAL POSITION IN A PRISON ENVIRONMENT?
- 10) EXPLAIN AND DESCRIBE ANY BONUSES OR INCENTIVES THAT YOU KNOW ABOUT, YOUR EMPLOYER OFFERS/USES TO MINIMIZE HIGH COST TREATMENTS ESPECIALLY TO THOSE WHO REQUIRE HOSPITALIZATION OR THE CONSULTATION OF SPECIALISTS?
- 11) EXPLAIN AND DESCRIBE HOW YOU CAME ABOUT YOUR JOB POSITION AT C.M.S. AND YOUR REASONS FOR LEAVING YOUR LAST JOB?

- 12) EXPLAIN AND DESCRIBE THE REACTION AND ANSWERS OF YOUR SUPERVISOR WHEN YOU ACTUALLY PUT HIM ON NOTICE OF PLAINTIFF'S CONDITION AND HIS NUMEROUS COMPLAINTS OF SUFFERING?
- 13) EXPLAIN AND DESCRIBE PREVIOUSLY FILED SICK CALL ON JAN. 7, 2007 (EXHIBIT X-19) WHO ADVISED MICHAEL SENISH, THE PHYSICIAN'S ASSISTANT TO WRITE AT THE BOTTOM OF SAID SICK CALL SLIP TO FOLLOW UP WITH THE UROLOGIST UPON RELEASE IN ONE MONTH BUT, PLAINTIFF ACTUALLY WAS'NT GOING TO BE RELEASED FOR ANOTHER 28 MONTHS?
- 14) EXPLAIN AND DESCRIBE WHEN AND WHERE YOU OBTAINED YOUR DOCTOR'S LICENCE AND HOW LONG YOU'VE HAD IT?
- 15) EXPLAIN AND DISCRIBE HOW YOU THINK YOU TREATED THE PLAINTIFFS MEDICAL NEEDS ACCORDING TO THE GENERALLY ACCEPTED PROFESSIONAL STANDARDS OF THE NATIONAL COMMISSION ON CORRECTIONAL HEALTH CARE, AND C.M.S.'s RULES OF MEDICAL PROCEDURES MANUAL?
- 16) EXPLAIN AND DESCRIBE HOW IT IS GENERAL PRACTICE TO GIVE A INMATE ASPIRIN AND TYLENOL FOR OVER 4 YEARS WHO HAS BEEN CO INFECTED WITH TWO DIFFERENT TYPE STRAINS OF THE HEPATITIS C VIRUS AND ATTEMPTING TO TREAT HIS TESTICULAR CYSTS PAIN WHILE THERE WAS DOCUMENTED PROOF THAT THIS COURSE OF TREATMENT WAS'NT WORKING?

- 17) EXPLAIN AND DESCRIBE WHY THAT AFTER PLAINTIFF WAS FINALLY SEEN BY THE UROLOGIST IN NOV. OF 2006 AND THE DOCTOR REQUESTED A ULTRA SOUND (WHICH WAS DONE DEC. OF 2006) AND A FOLLOW UP CONSULTATION VISIT TO DISCUSS FURTHER TREATMENT OPTIONS WAS CANCELLED AND BY WHO FOR WHAT REASONS?
- 18) EXPLAIN AND DESCRIBE WHY WHEN THE RESULTS OF THE 2ND ULTRA SOUND REVEALED PAINFUL BILATERAL CYSTS AND POSSIBLE INTERMITTENT TORSION, NO ONE INFORMED THE PLAINTIFF ABOUT ANY DOCTOR RECOMMENDATIONS AND ALL THEY TOLD HIM IS THAT I HAD TWO CYSTS ON THE TESTICLES AND IT WAS NORMAL TO HAVE THEM AND THE ONLY TREATMENT I COULD RECEIVE WAS TYLENOL?
- 19) EXPLAIN AND DESCRIBE WHAT OR WHO'S CUSTOM OR POLICY YOU WERE FOLLOWING WHEN YOU TREATED THE PLAINTIFF?
- 20) EXPLAIN AND DESCRIBE WHAT YOU DID AFTER YOU READ AND COMPARED THE 2ND AND 3RD ULTRA SOUND REPORTS SOME 13 MONTHS APART AND SAW THE CYSTS WERE GETTING BIGGER AND MORE PAINFUL?
- 21) EXPLAIN AND DESCRIBE YOUR POSITION AND DUTIES AS A MEDICAL CARE GIVER FOR C.M.S.?
- 22) EXPLAIN AND DESCRIBE THE PLAINTIFFS MEDICAL SITUATION THAT YOU INFORMED/ADVISED TO YOUR SUPERVISOR ABOUT AND THEIR REPLY TO THIS INFORMATION?

RESPECTFULLY,

Adam Wenzke
PLAINTIFF

July 29, 2008
DATE

ADAM WENZKE #182595
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DE 19977

CERTIFICATE OF SERVICE

I ADAM WENZKE, HEREBY CERTIFY THAT I HAVE SERVED A TRUE COPY OF THE 1 NOTICE OF
INTERROGATORIES UPON THE FOLLOWING PARTIES:

1) DEPARTMENT OF JUSTICE
OPHELIA M. WATERS
820 N. FRENCH ST
WILM, DE 19801-3509

2) OFFICE OF THE CLERK
U.S. DISTRICT COURT
844 N. KING ST. Lockbox 18
Wilm, DE 19801-3570

By PLACING SAME IN A SEALED ENVELOPE, AND DEPOSITING SAME IN THE U.S. MAIL AT THE DELAWARE CORRECTIONAL CENTER, SMYRNA DE 19977

ON THIS 29 DAY OF July 2008

Adam Wenzke